

JAP:ZA

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

**M-09-943**

- - - - -X

UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 952(a)  
and 960)

DANIEL AMPEM-DARKO,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

CHRISTOPHER MCKELVY, being duly sworn, deposes and states that he is a Special Agent with United States Immigration and Customs Enforcement, Department of Homeland Security, duly appointed according to law and acting as such.

Upon information and belief, on or about September 22, 2009, within the Eastern District of New York and elsewhere, defendant DANIEL AMPEM-DARKO did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing heroin, a Schedule I controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:<sup>1/</sup>

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<sup>1/</sup> Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant

1. During the afternoon of September 22, 2009, defendant DANIEL AMPEM-DARKO ALZATE arrived at John F. Kennedy International Airport in Queens, New York, aboard Air Morocco flight number 200 from Morocco.

2. DANIEL AMPEM-DARKO was selected by Customs and Border Protection ("CBP") Inspectors for a routine examination. He presented a brown "tracker" suitcase for inspection. The inspector asked routine customs questions establishing that the suitcase and its contents belonged to DANIEL AMPEM-DARKO.

3. Upon examining the suitcase, CBP officers noticed that its bottom appeared unusually thick. The officers probed the bottom of the suitcase and found that it was a false bottom filled with a tan powdery substance.


4. CBP officers field tested the substance hidden in the defendant's suitcase and the test was positive for heroin.

4. The gross weight of the substance recovered from the defendant's suitcase that field-tested positive for heroin is approximately 2,168 grams.

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facts and circumstances of which I am aware.

WHEREFORE, your deponent respectfully requests that the defendant DANIEL AMPEM-DARKO be dealt with according to law.

  
\_\_\_\_\_  
CHRISTOPHER MCKELVY  
Special Agent  
Immigration and  
Customs Enforcement

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